



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211



SDMS DocID 556436

March 28, 1989

ATF Davidson Co., Inc.
355 Main Street
Northbridge, MA 01588

Superfund Records Center

SITE: Conch Property
BREAK: 11.9
OTHER: 556436

RE: Request for information pursuant to Section 3007 of the Resource Conservation and Recovery Act, 42 U.S.C. Section 6927, and Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. Section 9604.

Dear Sir or Madam:

The Environmental Protection Agency Region I office is in receipt of your response to the Request for Information issued to your company on November 25, 1988. Responses are currently being evaluated in detail by EPA.

If additional information is required to satisfy the November 25, 1988, letter, EPA will notify you in the future.

EPA appreciates your assistance and cooperation in this matter.

Sincerely yours,


John F. Zipeto, P.E., M.P.H.
Massachusetts Waste Management Branch

cc: William F. Cass, DEQE



355 MAIN STREET
WHITINSVILLE, MASSACHUSETTS 01588
(508) 234-7451 FAX-508-234-6972
TELEX 928-429

January 26, 1989

Mr. Merrill S. Hohman
Director Waste Management Division
United States Environmental Protection Agency
Region 1
J. F. Kennedy Federal Building
Boston, Massachusetts 02203-2211

Dear Mr. Hohman:

On November 29, 1988 we received a letter from your office by certified mail relating to EPA I.D. No. MAD046128559.

Our facilities manager at that time, Joseph Menendez, attended an EPA meeting in Boxborough, Massachusetts. The main intent of which was to clarify our position relative to your letter of the 25th. Mr. Menendez reported to me that since the EPA I.D. No. MAD046128559 was issued to ATF-Davidson Company while it was a part of White Consolidated Industries of Cleveland, Ohio, that the matter should be referred to them. This I.D. number was assigned to that entity which encompassed a sprawling facility of hundreds of acres and over 1,500,000 square feet of floor space. While ATF-Davidson Company was under White Consolidated Industries, its environmental affairs were handled under the direction of a corporate environmental office out of Cleveland, Ohio.

On December 10, 1986 ATF-Davidson Company, Inc. was formed as a leveraged buyout. The portion of the original complex purchased from White Consolidated Industries was a 200,000 square foot facility which had been separated from the main complex. The larger portion had been sold to a Mr. Sydney Covich prior to the L.B.O.

White Consolidated Industries contractually accepted responsibility for the old facility and any liability for the acquired portion which predated the L.B.O.

White Consolidated Industries notified ATF-Davidson Company that it was no longer entitled to use their EPA number and that ATF-Davidson would have to procure its own number which we subsequently did and that number is EPA I.D. No. MAD981885940. As a result of this information, I forwarded the letter of the 25th to White Consolidated Industries to the attention of Mr. James L. Calhoun, Vice President of Regulatory Affairs.

On January 5th I received a second letter from your office dated December 30, 1988 which I forwarded to Mr. Calhoun under a cover letter dated January 9, 1989. On January 20, 1989 I received a letter from Mr. Calhoun of White Consolidated Industries dated January 16, 1989 informing me that in his opinion I should contact the EPA, make them aware of the present owners, and determine what if any response is required in regard to the request for information.

Mr. M. S. Hohman
U.S. Environmental Protection Agency
Boston, MA

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January 26, 1989

I then initiated a series of phone calls to Ms. Nancy Smith explaining our situation and requesting clarification relative to the current ATF-Davidson Company's responsibility in this matter. It was determined that the original EPA I.D. No. MAD046128559 was issued to ATF-Davidson while under White Consolidated Industries for a storage area constructed in one of the complex's buildings (see attachment A). I subsequently recovered a memo from my file dated May 16, 1984 (see attachment B) which pertains to the White Consolidated Industries I.D. number.

The original hazardous waste storage site was removed as part of an extensive cleanup project as a requirement of the sale of the facility to the previously mentioned Mr. Covich. The area in question was vacated by ATF-Davidson while under White Consolidated Industries in pristine condition. I had the opportunity to tour the facility on a social occasion and found the area at that time to have been extensively renovated and suitable for office space, light manufacturing, etc. I have no current knowledge of its present condition as the facility is private property to which I would not normally have access.

Ms. Smith, although quite helpful, indicated that this particular situation was quite complex and she ultimately referred me to Mr. Steve Manjion. Mr. Manjion suggested that I document all available information and forward it to you. Since the current ATF-Davidson Company, Inc. located at 355 Main Street is a separate and distinct entity with EPA I.D. No. MAD981885940 from ATF-Davidson as it existed under White Consolidated Industries' EPA I.D. No. MAD046128559, it is our opinion that White Consolidated Industries should answer your letters of November 25, 1988 and December 30, 1988.

Please notify us if we have any further responsibility in this matter or if you require additional information of any kind.

Sincerely,

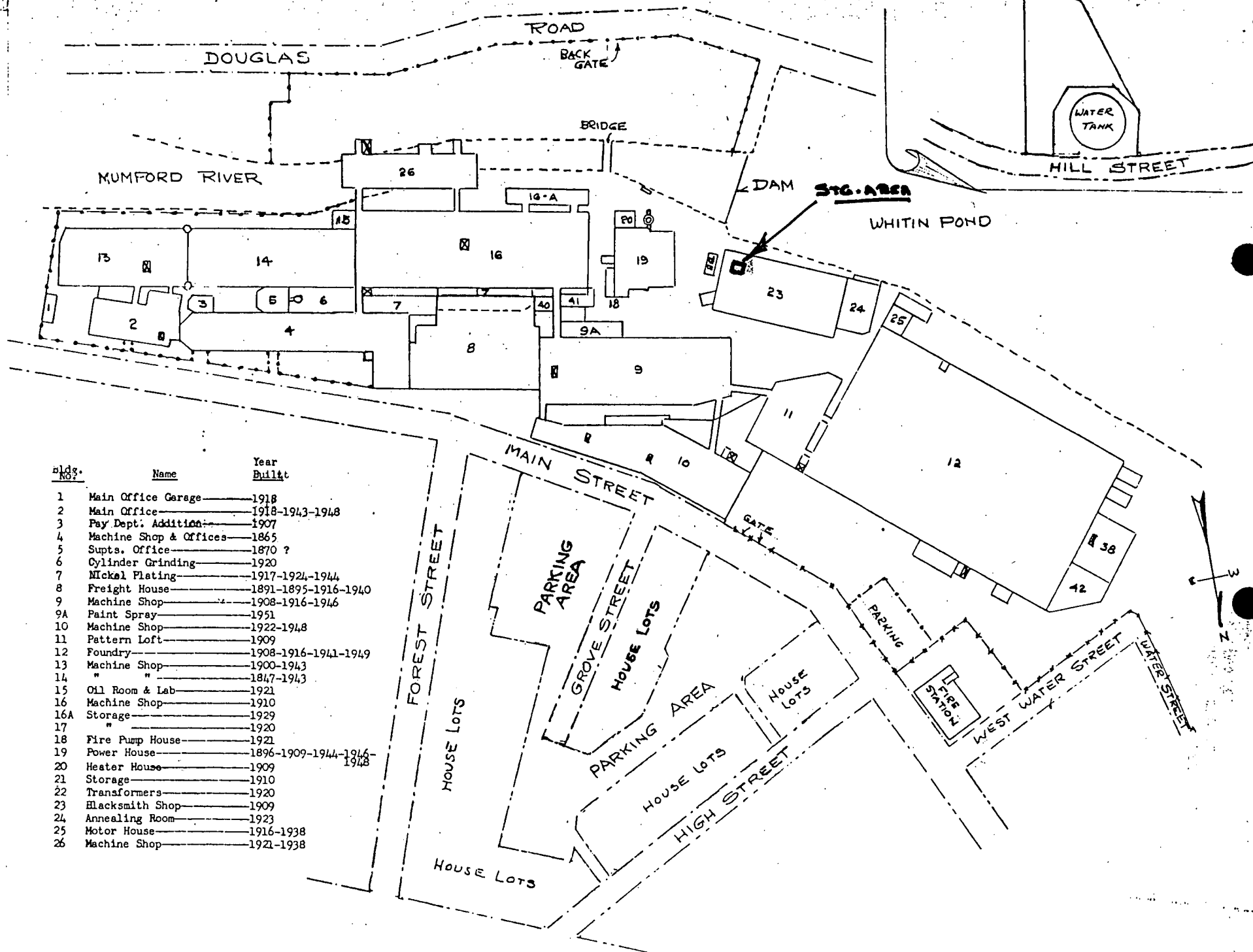
ATF-DAVIDSON COMPANY


Ernest Baillargeon
Vice President/Manufacturing

EB/ib

cc: Mr. C. A. Brown, President, ATF-Davidson Company
Mr. A. Nedoroscik, Facilities Manager, ATF-Davidson Company
Mr. J. L. Calhoun, Vice President Regulatory Affairs
White Consolidated Industries

Enclosures A and B



<u>Bldg. No.</u>	<u>Name</u>	<u>Year Built</u>
1	Main Office Garage	1918
2	Main Office	1918-1943-1948
3	Pay Dept. Addition	1907
4	Machine Shop & Offices	1865
5	Supts. Office	1870 ?
6	Cylinder Grinding	1920
7	Nickel Plating	1917-1924-1944
8	Freight House	1891-1895-1916-1940
9	Machine Shop	1908-1916-1946
9A	Paint Spray	1951
10	Machine Shop	1922-1948
11	Pattern Loft	1909
12	Foundry	1908-1916-1941-1949
13	Machine Shop	1900-1943
14	"	1847-1943
15	Oil Room & Lab	1921
16	Machine Shop	1910
16A	Storage	1929
17	"	1920
18	Fire Pump House	1921
19	Power House	1896-1909-1944-1946-1948
20	Heater House	1909
21	Storage	1910
22	Transformers	1920
23	Blacksmith Shop	1909
24	Annealing Room	1923
25	Motor House	1916-1938
26	Machine Shop	1921-1938



ATF-DAVIDSON COMPANY

ATTACHMENT 18
MAIN STREET
WHITINSVILLE, MASSACHUSETTS 01588
(617) 234-7451 TELEX 928-429

May 16, 1984

RECEIVED

MAY 18 1984

E. BAILLARGEON

Jacob Edwards
State Waste Programs
U.S. EPA, Room 1903
JFK Federal Building
Boston, MA 02203

Dear Mr. Edwards:

ATF-Davidson Company requests that its hazardous waste treatment facility permit be terminated for two reasons.

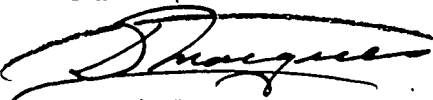
First, the permit application refers to treatment of electroplating wastewater. We filed the application as was required by the federal regulation for this wastewater treatment system. After we had filed, the rules were changed so that these types of facilities were covered only by the N.P.D.E.S. System. Because of this, we believe that we do not need a hazardous waste treatment permit for this operation.

Secondly, we had also filed for storage authority in our application. Our feeling was that as long as we needed a permit anyway, we should be able to collect our wastes into quantities that would fill a semi-truck trailer. Since our waste generation rate is so low, this would require more than 90 days. However, since we do not require a treatment permit and since the storage over 90 days requirements are so burdensome (relative to paperwork), we now feel that it is in our best interest to remove all waste within 90 days regardless of transportation premiums.

We are enclosing a statement which we believe terminates our permit application and interim status. If you have need for further information, please call me at (617)234-7451.

Very truly yours,

ATF-DAVIDSON COMPANY


Daniel Marques
Facilities & Energy Mgr.

/lk
attachment

cc: Nancy Wrenn
Division of Hazardous Waste
DEQE
1 Winter Street
Boston, MA 02108

DEQE Regional Office
Central Region
75B Grove Street
Worcester, MA 01605

bcc: Mr. R. C. Bryan, Mr. P. M. Whitney, Mr. E. Baillargeon,
Mr. R. E. Hill (WCI)

One of the White Consolidated Industries

C E R T I F I C A T I O N

I, Daniel Marques, Facilities & Energy Mgr., hereby
(name) (position)

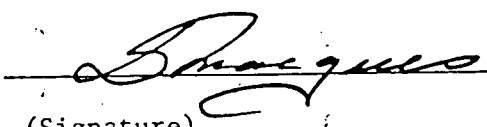
certify that ATF-Davidson Co., MAD046128559, which
(name of company) (EPA I.D. #)

notified the U.S. Environmental Protection Agency ("EPA") that it treats, stores and/or disposes of hazardous waste, at all times from this date forward (1) will not accumulate any hazardous waste for more than 90 days; (2) will accumulate hazardous waste in compliance with 310 CMR 30.340; (3) will not store, treat, or dispose of hazardous waste; and (4) will comply with all other applicable requirements of 310 CMR 30.000.

I understand that the Department of Environmental Quality Engineering is deferring applicability of the financial responsibility requirements of 310 CMR 30.900 as a result of ATF-Davidson Co. having submitted
(name of company)

a request for change of status and this certification, so long as
ATF-Davidson Co. abides by the terms of this certification.
(name of company)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment.


(Signature)

Daniel Marques

(Name typewritten)